

**Amanda M. Gatti**

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**From:** Amanda M. Gatti  
**Sent:** Wednesday, June 14, 2017 1:06 PM  
**To:** Amanda M. Gatti  
**Subject:** FW: Lack of response from you.  
**Attachments:** Communications - Witnesses.docx

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**From:** Chris Wido [mailto:[Chris.Wido@spitzlawfirm.com](mailto:Chris.Wido@spitzlawfirm.com)]

**Sent:** Thursday, March 23, 2017 9:27 AM

**To:** Barry Freeman

**Cc:** Brian Spitz

**Subject:** RE: Lack of response from you.

Barry,

Please find attached Henrietta's written communications with the witnesses. Because everything was forwarded to me, the fastest way I could produce it was to copy and paste it into word for now. If you want, I will have the original emails with Henrietta's communications with me redacted, but that will take more time since I am in court all day today.

I left the document in word format so the affidavits as they were originally attached in the emails should work. If they don't, please let me know. Finally, I am open to requesting an extension on the reply brief, which by which I assume you did not mean the brief in opposition due tomorrow. Please let me know.

All the best,

*Chris Wido*

Chris P. Wido

**THE SPITZ LAW FIRM, LLC**

**The Employee's Attorney.<sup>TM</sup>**

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**From:** Barry Freeman [<mailto:bfreeman@bdblaw.com>]

**Sent:** Wednesday, March 22, 2017 9:27 AM

**To:** Chris Wido <[Chris.Wido@spitzlawfirm.com](mailto:Chris.Wido@spitzlawfirm.com)>; Brian Spitz <[Brian.Spitz@spitzlawfirm.com](mailto:Brian.Spitz@spitzlawfirm.com)>

**Cc:** Gail Richards <[grichards@bdblaw.com](mailto:grichards@bdblaw.com)>

**Subject:** Lack of response from you.

Guys:

I kept my word and, despite having to draft the MSJ response due on Friday, I responded to the discovery issues you raised last Friday.

In contrast, you have not responded to the discovery issue I raised last Friday: Lack of production of communications between Plaintiffs and 3<sup>rd</sup> parties. I specifically identified Dean, Demink and Daugherty, but 3d parties would also include members of the class before they opted-in. When I tried to make it quick and easy by asking you to produce YOUR communications with them, Brian said "there are none" and Chris, in a slip of the tongue, disclosed the rest of the story: You used Henrietta Wilson as a conduit to communicate with 3d parties.

By using Henrietta Wilson as a conduit, any communications you had with Wilson for 3d parties is NOT privileged. Please advise when we will receive YOUR communications with Wilson (or any other plaintiff) to communicate with 3d parties.

In addition, we requested (RFP No. 6) "all communications between the Plaintiffs and any other person (excluding Plaintiffs' attorneys) which in any way relate to the claims contained in the Complaint." That request was made 7 MONTHS AGO. Plaintiffs' response was "Plaintiff is producing all responsive documents in her possession." By your own admission, that is not the case. Please advise when we will receive those communications – including all electronic communications and all records of phone calls to 3d parties. If all electronic communications and records of phone calls are not produced, we will have to either do a forensic analysis of Plaintiffs' devices and/or file a spoliation motion.

In any event, please respond to my discovery issue since I responded to yours,

Barry

**Barry Y. Freeman**  
**Partner**  
**Buckingham, Doolittle & Burroughs, LLC**  
**1375 E. 9th Street, Suite 1700**  
**Cleveland, OH 44114**

d: 216.736.4223  
f: 216.615.3023  
c: 216.410.2844

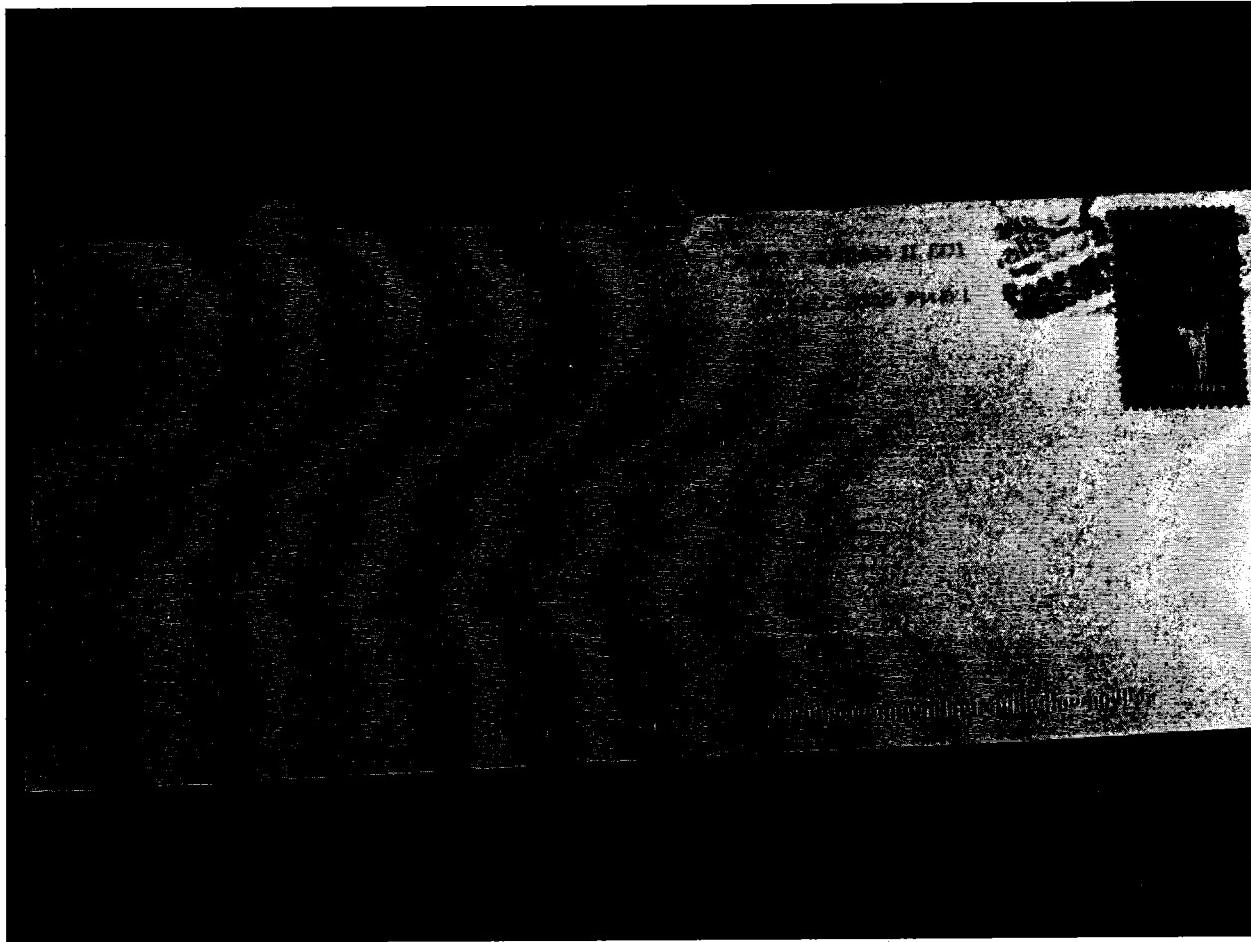
[bfreeman@bdblaw.com](mailto:bfreeman@bdblaw.com)  
[bdblaw.com](http://bdblaw.com)



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**BUCKINGHAM**

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Sent from my iPhone

Begin forwarded message:

**From:** timmothy wilson <[wilsotimo@hotmail.com](mailto:wilsotimo@hotmail.com)>  
**Date:** November 30, 2016 at 3:41:06 PM EST  
**To:** "[ldaugherty@gmail.com](mailto:ldaugherty@gmail.com)" <[ldaugherty@gmail.com](mailto:ldaugherty@gmail.com)>  
**Subject:** Linda we need for you to sign this affidavit and have it notarized , I will send you every penny that you had to spend. Thank you Henrietta Wilson



Daugherty  
Affidavit.docx

Sent from my iPhone

**From:** Linda Daugherty <[ldauherity@gmail.com](mailto:ldauherity@gmail.com)>

**Date:** September 13, 2016 at 10:09:52 PM EDT

**To:** [henrietta.wilson15@icloud.com](mailto:henrietta.wilson15@icloud.com)

**Subject:** PrimeSource Healthcare

To Whom it May Concern:

My name is Linda Daugherty. I was a dental manager at PrimeSource for 10 months with Henrietta Wilson as part of the dental field team. Henrietta spent most of her days working over 8 hours in the field, including weekends. Her day did not end when she left a nursing home facility. She put in additional hours at home each night sterilizing equipment, preparing prosthetics for shipment and delivery, and completing paperwork, to name a few tasks. Henrietta, and other field staff, brought this to the attention of the managers and directors in the corporate office on a consistent basis, but to no avail. Even after numerous complaints, the expectations of directors and above did not change.

Please feel free to contact me with any additional questions.

Thank you,

Linda Daugherty

[ldauherity@gmail.com](mailto:ldauherity@gmail.com)

847.302.4795

**From:** Henrietta Wilson <[henrietta.wilson15@icloud.com](mailto:henrietta.wilson15@icloud.com)>

**Date:** November 28, 2016 at 8:22:01 PM EST

**To:** Wanice <[jdea227@aol.com](mailto:jdea227@aol.com)>

**Subject:** Dean Affidavit.docx

If you agree, can you sign and get the affidavit notarized, he said if you need to change anything that's wrong feel free, but he wants to see what was change before you sign. Please thank you

Sent from my iPhone



Dean Affidavit.docx

----- Forwarded message -----

**From:** Henrietta Wilson <[henrietta.wilson15@icloud.com](mailto:henrietta.wilson15@icloud.com)>

**Date:** Fri, Dec 2, 2016 at 2:17 PM

**Subject:**

**To:** [raechel.red@gmail.com](mailto:raechel.red@gmail.com)



Demink  
Affidavit.docx

Sent from my iPhone

----- Forwarded message -----

**From:** Henrietta Wilson <[henrietta.wilson15@icloud.com](mailto:henrietta.wilson15@icloud.com)>

**Date:** Wed, Jan 4, 2017 at 2:13 PM

**Subject:** New affidavit

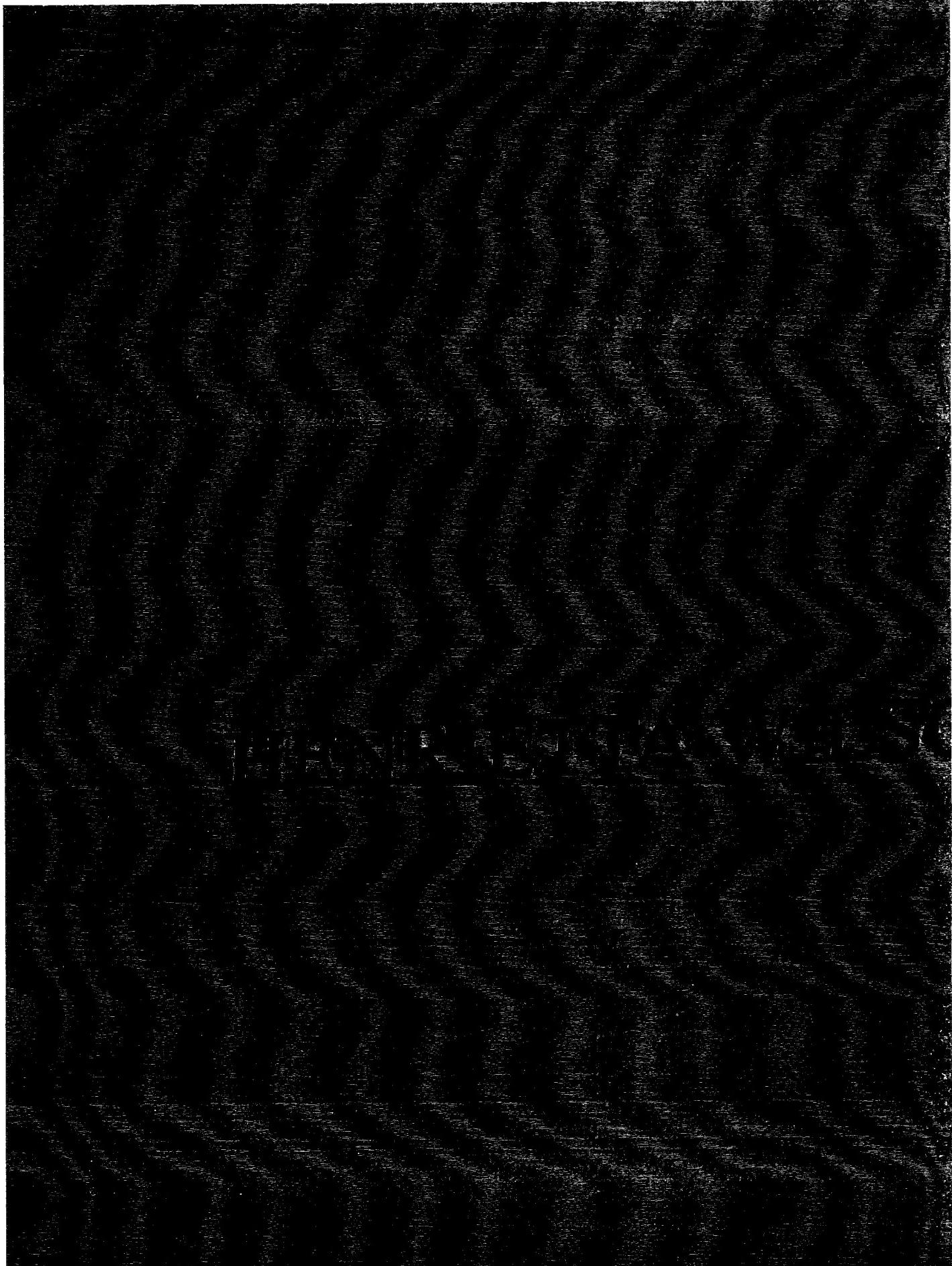
To: [raechel.red@gmail.com](mailto:raechel.red@gmail.com)

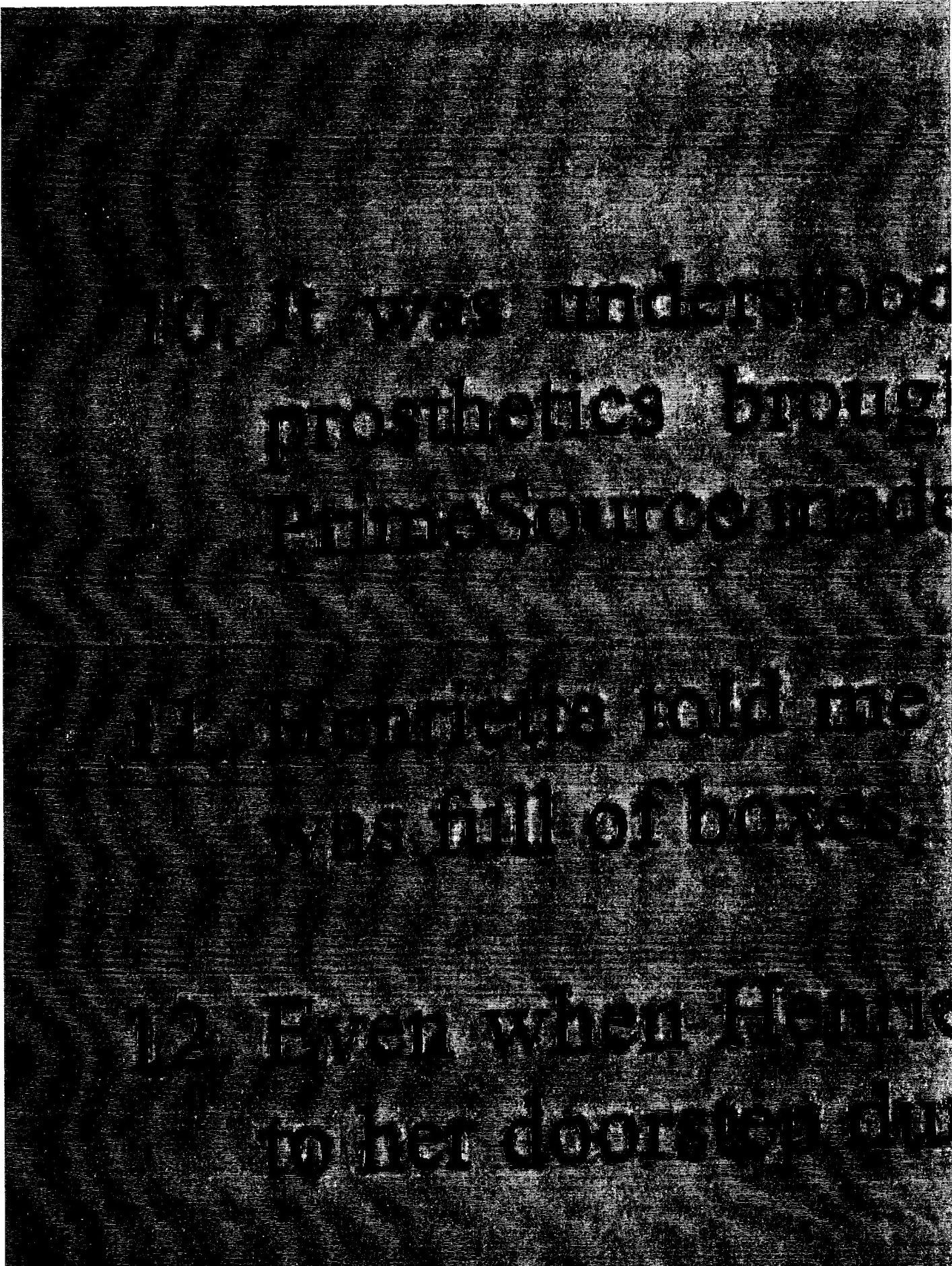
Sent from my iPhone



Demink  
Affidavit.docx

**From:** Raechel deMink <[raechel.red@gmail.com](mailto:raechel.red@gmail.com)>  
**Date:** January 4, 2017 at 6:19:17 PM EST  
**To:** Henrietta Wilson <[henrietta.wilson15@icloud.com](mailto:henrietta.wilson15@icloud.com)>  
**Subject: Re: New affidavit**





RaecheI

On Jan 4, 2017, at 2:13 PM, Henrietta Wilson <[henrietta.wilson15@icloud.com](mailto:henrietta.wilson15@icloud.com)> wrote:

<Demink Affidavit.docx>

Sent from my iPhone